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From: A RUBIN [mailto:rubinhial@verizon.net] **Sent:** Sunday, August 03, 2008 8:22 PM To: Zahradka, Neil; Corbin, Jeff (GOV)

Subject: EMS- Please post

Neil and Jeff:

I believe that the adoption of effective Environmental Management Systems (EMSs) by every wastewater treatment agency that manages biosolids in Virginia is critical to reducing/eliminating citizen complaints and reports of adverse health impacts. On page 13 In the current (Summer/Fall, 2008) issue of The Conduit, a publication for the membership of the Virginia Water Environment Association, is an article entitled "Biosolids EMS Certification now in Virginia". The author of the article is the Alexandria (VA) Sanitation Authority (ASA) and it may have been written by Karen Pallansch, a member of our Panel. The ASA received its EMS certification from the National Biosolids Partnership (NBP) on April 29, 2008.

To me, the key attribute of an effective biosolids EMS program is that the biosolids program operates above and beyond regulatory requirements to address and thereby mitigate/eliminate citizen complaints and reports of adverse health impacts. To illustrate, I am quoting from sections of this article:

"Organizations who are admitted and certified by the NBP must meet five requirements:

- The agency has committed to make continual improvements in their Environmental Management System for environmental performance, regulatory compliance, public participation (emphasis added), and biosolids management practices.

"It's listening to the people that your biosolids program impacts and incorporating their feedback into your continual improvement objectives." (Emphasis added).

"ASA identified additional benefits since operating under an EMS. Below are some of the highlights:

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- Improved Communication- The implementation of the EMS required significant collaboration internally as well as externally with stakeholders and contractors. (Emphasis added).

An EMS allows concerned citizens to have significant influence on how a biosolids management project operates to reduce/eliminate the impact that the project has on their community.

Further information on the ASA EMS program may be obtained at www.alexsan.com.